

FILED

NOV 10 2021

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN SCHICKE,

Defendant.

No. **4:21CR00617 HEA/JMB**

**MOTION FOR PRETRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its Attorneys, Sayler Fleming, United States Attorney for the Eastern District of Missouri, and Gerald Jackson, Special Assistant United States Attorney for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with Felon in Possession of a Firearm in violation of 18 U.S.C. § 922(g)(1), an offense for which a maximum 10-year imprisonment is prescribed under Title 18 U.S.C. § 924(a)(2).

2. According to the St. Louis County Police Department, on January 25, 2021, Officers observed a black Dodge Charger back out of a parking spot and begin to drive in front of the officer's vehicle at the corner of South Broadway and Vincent Avenue in St. Louis County in the Eastern District of Missouri.

3. Following a computer check of the vehicle, officers learned that the vehicle belonged to the Defendant, and that the Defendant had an outstanding probation violation warrant for his arrest.

Officers activated their lights and pulled over the vehicle, making contact with the Defendant.

4. Defendant was placed under arrest, and disclosed to officers that he had a firearm in the center console of the vehicle.

5. Officers later found two handguns in the center console of the vehicle: a Ruger Security 9mm handgun loaded with 15 rounds of 9mm ammunition and a Smith & Wesson Bodyguard revolver loaded with 5 rounds of .380 ammunition.

6. A computer check confirmed that the Ruger was a stolen firearm from St. Louis City, Missouri. An additional computer check revealed that the Defendant was a convicted felon.

7. An examination of both weapons found that the weapons were both manufactured outside the State of Missouri and both meet the federal definition of a firearm.

8. Defendant, who is a convicted felon, possessed two firearms, one of which was stolen. Defendant poses a threat to the community.

9. Defendant's criminal history reflects that he has conviction(s) including, but not limited to, the following:

Date	Court	Case No.	Charge	Sentence
3/17/1988	St. Louis County Circuit Court		Burglary 2 <sup>nd</sup> , Felony Stealing	SIS with 3 years probation
8/31/2016	St. Louis City Circuit Court	1522-CR02775-01	Poss of CDS	SIS with 3 years probation
5/25/2017	St. Francois County Circuit Court	16SF-CR-01502	Misd Domestic Assault	30 days county jail
3/6/2020	St. Louis City Circuit Court	1722-CR04810-01	Burglary 2 <sup>nd</sup> , Felony Stealing, Felony Property Damage	4 years DOC with 120 days pursuant to § 559.115 on each count

10. Defendant committed this offense while on state parole/probation. Defendant's inability to comply with the law while on probation and parole is indicative of his danger to the community and risk of flight were he to be released on bond in this case.

11. There is a serious risk that Defendant will flee, given his failure to comply with

supervision while on probation / parole, and the potential sentence Defendant faces in this case.

12. Defendant's criminal history and the nature and circumstances of the offense charged reflect that there is a serious danger to the community that would be posed by Defendant's release. Further, there are no conditions or combination of conditions that will reasonably assure Defendant's appearance as required.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING  
United States Attorney

/s/ Gerald Jackson  
GERALD JACKSON, #66995MO  
Special Assistant United States Attorney